

**UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF OHIO**

<b>IN RE: Mustafa &amp; Candice Giabou</b>	)	<b>CASE NO. 22-60128</b>
	)	
	)	<b>JUDGE RUSS KENDIG</b>
	)	
<b>Debtors</b>	)	<b>CHAPTER 13</b>
	)	
	)	<b><u>RESPONSE OF DEBTORS</u></b>
	)	<b><u>TO PERFORMANCE FINANCE'S</u></b>
		<b><u>OBJECTION TO CONFIRMATION</u></b>

COME NOW, Mustafa & Candice Giabou ("the Debtors"), who for their Response to Performance Finance's Objection to Confirmation say:

Debtors are negotiating a valuation of the collateral at issue.

WHEREFORE, the Debtors respectfully request that Performance Finance's Objection to Confirmation be denied.

**Respectfully submitted,**

**BY: /S/Robert A. Ciotola**  
**ROBERT A. CIOTOLA (#0012487)**  
**Attorney for Debtors**  
**3701 Boardman-Canfield Road**  
**Bldg. B, Ste. 102**  
**Canfield, OH 44406**  
**(330) 533-8885**

**CERTIFICATE OF SERVICE**

I certify that on **March 15, 2022**, a true and correct copy of this Response was served:

Via the Court's Electronic Case Filing System on the U.S. Trustee, and these entities and individual who are listed on the Court's Electronic Mail Notice List:

Milos Gvozdenovic, on behalf of Performance Finance at mgvozdenovic@weltman.com;  
Dynele L. Schinker-Kuharich, on behalf of the Chapter 13 Trustee's office at  
DLSK@Chpater13Canton.com;

And by regular U.S. mail, postage prepaid, on:

Mustafa & Candice Giabou, 10180 State Route 212, Apt. A, Bolivar, OH 44612

**/S/Robert A. Ciotola**  
**ROBERT A. CIOTOLA (#0012487)**  
**Attorney for Debtors**  
**3701 Boardman-Canfield Road**  
**Bldg. B, Ste. 102**  
**Canfield, OH 44406**  
**(330) 533-8885**  
**rac@raciotola.com**